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**Amendments to the Drawings:**

The attached sheet of drawings includes additional Figure 7, which is a schematic figure showing the coupling in connection with an airplane seat, as requested by the Examiner.

Attachment: Additional Drawing Sheet

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### **Remarks/Arguments:**

#### **I. Introduction**

Upon entry of the present amendment, claims 1-11 will be pending in this application. The Examiner has withdrawn claim 12 from examination. Claim 1 has been amended to clarify certain aspects of the invention. Support for this amendment appears in figures 3 and 5-6, as well as in the specification at pages 6 and 7. Based on the following remarks, Applicants respectfully request reconsideration of the Examiner's rejections and allowance of the pending claims.

#### **II. Drawings**

The Examiner has objected to the drawings as not showing the invention of claim 11, an airplane seat. Applicants submit herewith an additional drawing, Figure 7, showing an airplane seat with the claimed coupling. Support for this new drawing appears in claim 11 itself, as well as in the specification itself at page 11.

#### **III. Specification**

The Examiner has objected to the specification as referring to the "hub" as identified by an incorrect reference numeral. Appropriate correction has been made.

The Examiner has also objected to the detailed description as not providing appropriate antecedent basis for the "circular disc" in claim 3 and the elements of claim 8. However, the exemplary center member that is shown in the original figures is a circular disc. Because the drawings are part of the description, claims may be based on what is shown in the drawings (even if not explicitly described in the specification). Additionally,

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MPEP 608.01(I) states that “[i]n establishing a disclosure, applicant may rely not only on the description and drawings as filed[,] but also on the original claims if their content justifies it.” Accordingly, Applicants respectfully request that the Examiner withdraw the rejection.

### III. 35 U.S.C. § 102

#### A. Downey

The Examiner has rejected claims 1-6, 8, and 10-11 under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 3,798,924 to Downey. The Examiner states that Downey teaches a coupling with first and second hub assemblies having the claimed elements. Applicants respectfully traverse this rejection and request reconsideration and withdrawal thereof.

“A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference.” *See* MPEP § 2131; *Verdegaal Bros. V. Union Oil Co. of Calif.*, 814 F.2d 628, 631 (Fed. Cir. 1987). However, the Downey patent fails to teach system that prevents axial misalignment, as presently claimed. It also fails to teach pins having a length sufficient to be received substantially completely by a means for receiving the pin. The Downey coupler uses recessed openings to receive the pins of the other hub assembly while providing clearance to accommodate parallel and angular misalignment of the shafts, but it fails to address the issue of axial misalignment. The Downey invention relies heavily on the space of the flanges to remain consistent. If any axial misalignment were to occur in the Downey coupler, the pins could move out of their recessed openings enough that the mechanical connection between

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the two flanges would be lost in the event of the torsion element failing. This is at least partially because the pins are not of a length sufficient to be received substantially completely by a means for receiving the pin. They are barely received by openings in the corresponding flange. See Downey Figure 2.

B. Hickman

The Examiner has also rejected claims 1-11 under 35 U.S.C. § 102(b) as being anticipated by GB Reference No. 582,901 to Hickman. The Examiner states that Hickman teaches a coupling with first and second hub assemblies having the claimed elements. Applicants respectfully traverse this rejection and request reconsideration and withdrawal thereof.

The Hickman reference does not teach, disclose or suggest hub assemblies that have an opening "for receiving the pin of the other hub assembly," much less a system in which those openings accommodate angular misalignment, axial misalignment (or both) of the shafts. First, as shown by Figure 1 of the Hickman reference, the Hickman hub assemblies do not have the claimed openings for receiving the pin of the other assembly. The coupling bolts 10 (which the Examiner has characterized as the claimed pins) are contained by the cavities 7 of the resilient member 6 (see Hickman Figure 1; col. 4, lines 30), they are not received by the opposite hub, as Applicants recite. Nor are the pins of a length sufficient to be received substantially completely by a means for receiving the pin. In fact, the Hickman claims clarify that the "heads of the coupling bolts within the cavities of the resilient member

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are extended *to be substantially flush* with the outer surface of the plates..." In short, heads that are flush with the plate are clearly not received by the plate. *See* Hickman, claim 1. Accordingly, Hickman device cannot handle axial misalignment, as is presently-claimed.

Another reason that the Hickman device cannot handle axial misalignment is because the "resilient member is sandwiched between and bonded to two plates." *See* col. 1. If any axial misalignment were to occur, the bolt heads would not make contact with the end of the slots in the opposite plate of the resilient member. The resilient member could be destroyed by overloading. Accordingly, because the Hickman device cannot handle angular, parallel, or axial misalignment, as the presently-claimed system is intended to do, nor does it have the claimed pin geometry, Applicant respectfully requests that the rejection be withdrawn.

C. Weiss

The Examiner has further rejected claims 1-6, 8 and 11 under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 4,708,692 to Weiss. The Examiner states that Weiss teaches a coupling having all of the claimed elements. Applicants respectfully traverse this rejection and request reconsideration and withdrawal thereof.

The Weiss patent also does not teach, disclose or suggest first and second hub assemblies that have openings for receiving the pin of the other hub assembly, nor a system in which those openings accommodate angular misalignment, axial misalignment (or both) of the shafts. First, Applicants note that the Examiner has not clarified what elements of the Weiss patent are considered to anticipate each and every element of the claimed invention.

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Accordingly, in an abundance of cooperation, Applicants have attempted to rebut two alternate interpretations.

To the extent that the Examiner is considering the couplings 3, 4 to correspond to Applicants' hub assemblies, it is respectfully pointed out that the shanks 14 of bolts 11 (which are likely the elements being compared to Applicants' pins) are not received by the opposite coupling. Moreover, to the extent that the Examiner is considering the connecting flanges 6, 9 to correspond to Applicants' hub assemblies, it is respectfully pointed out that the shank 14 of bolt 11 (which is likely the element being compared to Applicants' pin) is screwed into the other flange, and it can only be screwed in one way. It is not received within an opening that can "accommodate any combination of angular misalignment, parallel misalignment, and axial misalignment," as Applicants recite. By its nature, a screw/screw thread assembly in intended holds the screw securely in place and does not accommodate for any misalignment. Accordingly, there is no teaching or suggestion in the Weiss patent to account for angular misalignment, as Applicants recite. To the extent that the Examiner intends to maintain this rejection, clarification of the rejection is requested.

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### CONCLUSION

For at least the above reasons, Applicants respectfully request allowance of claims 1-11 and issuance of a patent containing these claims in due course. If there remain any additional issues to be addressed, the Examiner is invited to contact the undersigned attorney at 404.815.6147.

Respectfully submitted,

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